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June 29, 2023

Via ECF:

The Honorable Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/29/2023
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Re: **Cashabamba v. USA Interiors LLC, et al.**
Civil Docket No.: 22-cv-03337 (MKV)

Dear Judge Vyskocil:

Our office represents Oscar P. Cashabamba (the “Plaintiff”), and we respectfully submit this letter motion, on consent of Defendants, to respectfully request a two (2) week extension of time for the parties to submit their Settlement Agreement, Motion for settlement approval and related settlement documents pursuant to *Cheeks v. Freeport Pancake House, Inc.* 796 F.3d 199 (2d Cir. 2015).

As a preliminary matter, this is the first such request in this case, and a granting of this request does not affect any other dates or deadlines in this matter.

On May 26, 2023, the parties apprised the Court that they have reached a settlement in principle on all claims asserted herein. *See* Dkt. No. 35. In response thereto, on May 30, 2023, the Court directed the parties to file their above-referenced settlement submissions on or before June 30, 2023. *See* Dkt. No. 36.

The reason the instant request is being made, however, is that our office is still in the process of finalizing the settlement documents and the parties require some additional time to finalize the documents, and procure our respective clients’ signatures.

Accordingly, we respectfully request a two (2) week extension of the current deadline through July 14, 2023.

We thank the Court for its kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

Roman Avshalumov
Roman Avshalumov, Esq.

CC: via ECF and Electronic Mail:

Steven Kaplan, Esq.

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ATTORNEY FOR THE DEFENDANTS

Granted. SO ORDERED.

Date: 6/29/2023
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge